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April 22, 1999

FDA Commissioner Jane Henney  
Food & Drug Administration  
5600 Fishers Lane, Room 14-71  
Rockville, MD 20857

Re: Docket 99P-0033/CP 1

Dear Commissioner Henney:

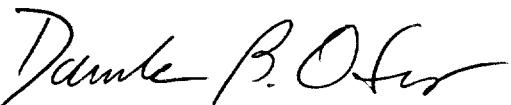
I strongly urge the FDA to act on the Humane Farming Association's petition intended to diminish the occurrence of transmissible spongiform encephalopathies in mammals.

I have been following this issue since the first cases of Mad Cow Disease were announced in Britain. The U.S. government has consistently refused to acknowledge that bovine spongiform encephalopathy (BSE) *might* occur in the U.S., where cattle have been given feed made from rendered cattle and other animals for a number of years. A herd of British cattle imported in the early 1990s was never completely accounted for; some of them may have ended up as feed for American cattle. Few "downer" cows (cows that die for no apparent reason) have been tested for BSE, although if there is BSE in the U.S., downer cows are the most likely to have it.

Meanwhile, a variety of potential BSE-carriers such as blood, blood products, gelatin and rendered pigs are still permitted for animal feed. The HFA petition would prohibit this.

The evidence from Britain is overwhelming that BSE and its relatives are transmitted through blood products as well as central nervous system matter. Although the U.S. government has not initiated an epidemiological survey to determine the extent of BSE-like diseases in animals or humans, that should not be an excuse to deny the HFA petition. Both the CDC and the FDA can point the finger at each other, saying there is not enough "scientific" evidence to begin, respectively, a monitoring program or feeding restrictions. There *is* enough science: the British experience should be considered a wake-up call. If the U.S. farm animal population proves to be free of BSE-like diseases, then the FDA may revise its feeding guidelines. But the public health should come first.

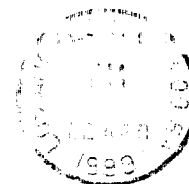
Yours truly,



99P-0033

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